

Privacy Impact Assessment (PIA) Reference Guide

The U.S. Department of Housing and Urban Development (HUD) PIA Reference Guide is designed to help HUD Program Offices understand the HUD PIA requirements and to understand how to fill out and submit a PIA for approval.

Per [Privacy Office Memorandum 02-00](#), *Authorization to Operate (ATO) and PIA Requirements to Launch Information System into Production (2020)*, all Program Offices are required to **complete a PIA for each HUD information system, General Support System (GSS), or electronic collection that collects, maintains, uses, and/or disseminates personally identifiable information (PII) about US citizens, Federal employees, and contractors.**

Program and Regional Offices, represented by their designated Privacy Liaison Officer (PLO), are responsible for filling out the PIA form in its entirety and ensuring the information is as complete and accurate as possible before sharing with the Privacy Office for review and approval. When filling out the PIA form, please be sure to use [plain language](#) and be as concise as possible. For additional questions, please contact the **HUD Privacy Office** via privacy@hud.gov. Make sure to **submit all PIAs to privacy@hud.gov.**

Front Matter: System Information

According to Section 208 of the E-Government Act of 2002, PIAs are required by all federal government agencies that develop or procure new information technology involving the collection, maintenance, or dissemination of information in identifiable form or that make substantial changes to existing information technology that manages information in identifiable form. According to the Act, the PIA's purpose is to demonstrate that system owners and developers have incorporated privacy protections throughout the entire life cycle of a system.

Please provide a **thorough and clear overview of all requested information** in the PIA template to ensure readers have the appropriate context to understand the responses.

PIA Question	PIA Reference Guidance
HUD Information System	Provide the name of the information system, GSS, or electronic collection.
HUD Division Name	Identify which HUD division to which the PIA applies.
CSAM ID*	Include the CSAM identification (ID) number.

*When completing PIAs for storing PII on **SharePoint** use the **CSAM ID D100** and ensure the **SharePoint and Shared Drive Administrators sign the PIA**. When completing PIAs for storing PII only on Shared Drive, please use **CSAM ID P207, P209, P212 or 1098**. Additional details are outlined in Section 4: Review and Signature Approvals.

*Make sure to fill out PIAs on this updated [template](#) and refer to privacy@hud.gov if you have any questions.

Section 1: PII Description Summary

Note that this is the only section of the PIA that is publicly released. Note that **yellow highlighted** questions come directly from the SORN and the information can be used to fill out and answer the PIA.

#	PIA Question	PIA Reference Guidance
A	The PII is	Identify the source from which the PII is collected. If you pick other, include an explanation as to where the PII is from.
B	The PII is in a/an	Identify whether the PIA is for a new, existing, or modified information system / collection.
C	Describe the purpose of this HUD information system or project, including the types of personal information about individuals collected in the system.	<p>A thorough and clear overview gives the reader the appropriate context to understand the system / collection's purpose. The overview should contain elements of the following:</p> <ul style="list-style-type: none"> • The purpose of the program, IT system, or technology and how it relates to the program office and agency mission. • A general description of the information in the IT system. A description of a typical transaction conducted on the IT system. • A general description of the modules and subsystems, where relevant, and their functions.
D	Why the PII is collected and / or what is the intended use of the PII?	Identify why PII is collected, maintained, used, or disseminated in the system is necessary to the program's or agency's mission, including why it is collected and how it will be used.
E	Do individuals have the opportunity to object to the collection of their PII?	<p>Identify if the person about whom information is collected can decline to provide their PII, along with the mechanism and reasoning for the response. If the answer is yes, then state that the PII collection is voluntary and give a further explanation. If the answer is no, then state that individuals don't have the right to consent and give a further explanation.</p> <p>Generally, individuals should have the right to object unless the information collection is required by law. For example, even though PII is mandatory for completing job or loan applications, individual can refuse to provide their PII, thereby withdrawing from the loan process.</p>
F	Do individuals have the opportunity to consent to the specific uses of their PII?	<p>Identify whether an individual may consent to specific uses or the consent is given to cover all uses (current or potential). Include the sentence(s) that explicitly state consent. If the answer is yes, then state that the PII collection is voluntary. If the answer is no, then state that individuals don't have the right to consent.</p> <p>If the answer to Section 1E is "yes," then the answer to Section 1F must also be yes.</p>

<p>G</p>	<p>When an individual is asked to provide PII, is a Privacy Act Statement (PAS) and / or a Privacy Advisory provided?</p>	<p>Identify the type of notice provided and the exact wording included within it. Make sure your PAS statement includes the following <u>exact format</u>:</p> <ul style="list-style-type: none"> • Authority: Legal authorities who are collecting the information • Principal Purpose: Purpose of listing out your information and why you're collecting it • Routine Use(s): where the information will be disclosed outside of HUD, to whom it will be disclosed to, and a link to the SORN where the routine uses are published • Disclosure: Acknowledge whether the information is mandatory or voluntary, and the consequences of not providing the requested information • System of Records Notice: (SORN) ID (URL Website where it's published) <p>A PIA form without exact wording of a PAS/PA will not be approved. If a Privacy Advisory is warranted, make sure to explicitly state in the system's SORN that the PII will NOT be stored and that PII is collected, but de-identified.</p> <p>Please do NOT write “We are not the original collectors of the data.” – even if you are not the original collector, then you would still need to provide direct language from the original collector when an individual is asked to provide PII. If the system does not directly collect PII from individuals, please provide the language used in the PAS of the system that does the direct collection.</p> <p>For example, if a System A only pulls data from System B, and System B directly collects the data from individuals, include the language from System B's PAS.</p>
<p>H</p>	<p>With whom will the PII be shared through data exchange, both within your HUD Division and outside your Division?</p>	<p>Identify if PII will be shared and the audience(s) with whom it will be shared.</p>
<p>I</p>	<p>Source(s) of the PII collected is/are?</p>	<p>Identify the types of source(s) and list the individual, entity, or entities providing the information.</p>
<p>J</p>	<p>How will the information be collected?</p>	<p>Identify the ways the information is collected. If 'other' is selected, then make sure to describe the alternative way of collecting information.</p>
<p>K</p>	<p>Does this HUD information system or project require a Privacy Act SORN?</p>	<p>If the system collects PII and retrieves information by a personal identifier, then a SORN is required. For existing systems, the SORN must be published in the Federal Register before collecting on individual(s). For new systems, please indicate whether a SORN is being drafted. If there are no exemptions, then a record must be disclosed. At a minimum, the SORN identifier and SORN number is required in order to complete this</p>

		<p>section. Please pay close attention to the authorities to ensure they align with the system(s). Make sure to include a direct link to the published SORN mentioned.</p> <p>PLO's can use the SORN Workflow to help assist and explain when a SORN is necessary.</p> <p>SORN package includes: SORN template, SORN Narrative Statement, and Letter to Congress Cover Letter</p>
L	What is the National Archive and Records Administration (NARA) approved, pending, or general records schedule (GRS) disposition authority for the system or for the records maintained in the system?	Identify if the records stored on the system was approved and / or pending by NARA.
M	What is the authority to collect information? A Federal law or Executive Order must authorize the collection and maintenance of a system of records. For PII not collected or maintained in a system of records, the collection or maintenance of the PII must be necessary to discharge the requirements of a statute or Executive Order.	List the full legal authority for operating the system and the legal authority to collect the information. Authorities include statutes, executive orders, and OMB memoranda. A general citation to an act, i.e., "The National Housing Act," is insufficient. The citation must point to the specific sections of the statute or other authority which are pertinent to the system's function.
N	Does this information system or project have an active and approved OMB Control Number?	<p>Identify if the information system has an active and approved OMB control number. If PII is being collected on forms, then there must be an OMB number. If the answer is no, then an explanation is required. If there are no PII forms, then no OMB number is required.</p> <p>Please reach out to your Program Office's PRA Liaison Officer for more information on OMB Control Numbers.</p>

Section 2: PII Risk Review

#	PIA Question	PIA Reference Guidance
A	What PII will be collected or maintained on the information system or project?	Identify and list all information in identifiable form that is collected and stored in the system.
B	If the Social Security Number (SSN) is collected, please list the proper HUD authority to do so.	Identify if the SSN is collected and, if so, please reference the policy, memo or directive that permits the use of SSNs. Also, please state why the use of SSN is necessary opposed to other identifiers.

Section 3: PII Security Measures

#	PIA Question	PIA Reference Guidance
A	How will the PII be secured?	Identify how the PII is secured, including as much relevant detail as possible.

B	What additional measures / safeguards have been put in place to address privacy risks for this information system or electronic collection?	Identify any additional safeguard information.
C	Where is PII stored associated with the system?	Identify how the information is stored. Indicate the assessment and authorization status, including the date it was granted.

Section 4: Review and Approval Signatures

Completion of the PIA requires coordination between the System Manager, Shared Drive and/or SharePoint Administrators (*if applicable*), Information System Security Officer (ISSO), Records Management Liaison Officer (RMLO), Privacy Liaison Officer (PLO), and HUD Records Officer **BEFORE** it is sent to the HUD Privacy Office.

HUD Privacy Office will review and forward to HUD Chief Privacy Officer and Senior Agency Official for Privacy (SAOP) for signatures.

Signatures for PII Storage in Shared Drive and SharePoint PIAs:

*If PIA is regarding PII storage on Shared Drive, the Program Office will use either **CSAM ID P207, P209, P212 or 1098** and the PIA must be routed to the Shared Drive Administrator for signature.

If PIA is regarding PII storage on SharePoint, PIA must be routed to both the Shared Drive **AND SharePoint Administrators for signatures and use the **CSAM ID D100**.

CPO PIA Review Schedule (First In/First Out):

- Potential Loss of Life (or COVID-19 Related)
- Secretary of HUD has mandated in writing that the system is a priority
- Current ATO Paperwork that is awaiting the PIA

If either of these reasons are not relevant to the PIA review process, then those PIA's will be reviewed in a timely manner based on when it has been sent in.

#	Required Signatures	PIA Reference Guidance
1	System Manager (or *Shared Drive Administrator, if applicable)	Signature to be completed by System Manager <i>or Shared Drive Administrator if applicable (if PIA is regarding PII storage in Shared Drive and/or SharePoint)</i>
2	**SharePoint Administrator (if applicable)	Signature to be completed by SharePoint Administrator <i>only if PIA is regarding PII storage in SharePoint.</i>
3	Information System Security Officer	Signature to be completed by ISSO
4	Records Management Liaison Officer	Signature to be completed by the RMLO
5	Privacy Liaison Officer	Signature to be completed by the PLO
6	HUD Records Officer	Signature to be completed by the HUD Records Officer
7	HUD Chief Privacy Officer	All required signatures before the CPO will need to be completed prior to submitting to the HUD Privacy Office for review and approval. The HUD Privacy Office will route PIA to the CPO once PIA is accurate and complete.

8	Senior Agency Official for Privacy (SAOP)	The CPO will route the PIA to the SAOP for final review and approval.
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